

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-4780 (LTS)
	:	
PUERTO RICO ELECTRIC POWER AUTHORITY,	:	
	:	
Debtor. ²	:	

	X	
	:	
UNION DE TRABAJADORES DE LA INDUSTRIA	:	
ELECTRICA Y RIEGO (UTIER),	:	
	:	
Plaintiff,	:	Adv. Proc. No. 17-228 (LTS)
	:	in 17-BK-4780 (LTS)
v.	:	
	:	
PUERTO RICO ELECTRIC POWER AUTHORITY, <i>et al.</i>	:	
	:	
Defendants.	:	

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474).

² The last four (4) digits of PREPA's federal tax identification number are 3747.

**OFFICIAL COMMITTEE’S URGENT INFORMATIVE MOTION
REGARDING BRIEFING SCHEDULE FOR AURELIUS MOTION TO DISMISS
AND UTIER ADVERSARY PROCEEDING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”) respectfully submits this informative motion regarding the briefing schedule with respect to (a) the *Objection and Motion of Aurelius to Dismiss Title III Petition* [Docket No. 913 in Case No. 17-BK-3283 (LTS)] (the “Motion to Dismiss”), (b) the *Motion of Aurelius for Relief from the Automatic Stay* [Docket No. 914 in Case No. 17-BK-3283 (LTS)] (the “Stay Relief Motion” and, together with the Motion to Dismiss, the “Aurelius Motions”), and (c) the adversary proceeding styled *Union de Trabajadores de la Industria Electrica y Riego v. Puerto Rico Electric Power Authority, et al.*, Adv. Proc. No. 17-228 (LTS) (the “UTIER Adversary Proceeding”). In support of this Informative Motion, the Committee respectfully states as follows:

1. This Court previously entered a scheduling order setting parallel briefing schedules in connection with the Aurelius Motions and the UTIER Adversary Proceeding [Docket No. 1245] (the “Scheduling Order”). Among other things, the Scheduling Order provides that the deadline for any party in interest (other than the United States) to object to object to the Aurelius Motion and the deadline to answer or otherwise respond to the complaint filed in the UTIER Adversary Proceeding is due by October 3, 2017.

2. Numerous parties have filed motions seeking and/or supporting an extension of the briefing schedule set forth in the Scheduling Order, including:

- the Financial Oversight and Management Board (the “Oversight Board”), *see* Docket No. 40 in Adv. Proc. No. 17-228 (LTS) (the “Oversight Board’s Urgent Motion”) and Docket No. 43 in Adv. Proc. No. 17-228 (LTS) (the “Oversight Board’s Response”);

- Aurelius Investment, LLC, Aurelius Opportunities Fund, LLC, and Lex Claims, LLC (collectively, “Aurelius”), *see* Docket No. 1385 in Case No. 17-BK-3283 (LTS) (“Aurelius’ Informative Motion”);³ and
- the United States [Docket No. 1387 in Case No. 17-BK-3283 (LTS) and Docket No. 44 in Adv. Proc. No. 17-228 (LTS)] (the “United States’ Motion for Extension of Time”).

3. The Committee supports the adjournment of the briefing schedule with respect to the Aurelius Motions and the UTIER Adversary Proceeding, provided that the briefing schedules remain on a parallel track. However, the various parties that have requested extensions have only sought to extend the deadlines as to themselves, not as to all parties in interest.⁴ The Committee therefore files this Informative Motion to request that any order extending the briefing schedule with respect to the Aurelius Motions apply to all parties in interest, and that any order extending the briefing schedule with respect to the UTIER Adversary Proceeding apply to the parties to such adversary proceeding and any party which is authorized by the Court to intervene in such adversary proceeding.⁵

Dated: October 2, 2017

/s/ G. Alexander Bongartz

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³ Aurelius filed its informative motion in response to this Court’s order, dated September 29, 2017 [Docket No. 1383 in Case No. 17-BK-3282 (LTS)], which directed Aurelius to indicate whether it consents to a briefing schedule consistent with the schedule proposed in the Oversight Board’s Urgent Motion.

⁴ For example, Aurelius’s Informative Motion proposes that “[t]he Board’s response to Aurelius’s motion and any response to UTIER’s complaint” be due by November 3, 2017. Aurelius’ Information Motion at 2. In response, the Oversight Board proposes that “Defendants’ responses to Aurelius’s motion to dismiss adversary proceeding [sic] and motion to lift stay must be filed by October 21, 2017.” Oversight Board’s Response at 3. The United States also only seeks to extend its own filing deadline. *See* United States’ Motion for Extension of Time at 3.

⁵ As this Court is aware, the Committee previously filed a motion to intervene in the UTIER Adversary Proceeding [Docket No. 24 in Adv. Proc. No. 17-228 (LTS)].

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- and -

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